

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

MAVERICK CONSTRUCTION CORP.,

Plaintiff,

v.

BUILDING AND CONSTRUCTION TRADES
COUNCIL OF BOSTON; LOCAL 103,
INTERNATIONAL BROTHERHOOD OF
ELECTRICAL WORKERS; and LOCAL 223
LABORERS INTERNATIONAL UNION OF
NORTH AMERICA,

Defendants.

C.A. No. 03-12537-WGY

DEFENDANT'S RULE 16.1(D)(3) CERTIFICATION

In accordance with Local Rule 16.1(D)(3), the undersigned defendant has conferred with counsel:

(a) with a view to establishing a budget for the costs of conducting the full course
- and various alternate courses - of the litigation; and

(b) to consider the resolution of the litigation through the use of alternate dispute
resolution programs such as those outlined in LR 16.4

Dated: 3/8/04

Respectfully submitted,



Michael Monahan Local 103, International
Brotherhood of Electrical Workers



Christopher N. Souris BBO #556343
KRAKOW & SOURIS, LLC
225 Friend Street
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CERTIFICATE OF SERVICE

I, Christopher N. Souris, hereby certify that I caused a copy of the foregoing to be mailed this date to David S. Rubin, Epstein, Becker & Green, P.C., 111 Huntington Avenue, Boston, MA 02199 and Thomas B. Coffey, Local Union 223 of the Laborers International Union of North America, 7 Laborers Way, Hopkington, MA 01748



Christopher N. Souris